

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

IN RE WILLIS TOWERS WATSON PLC  
PROXY LITIGATION

Civ. A. No. 1:17:cv-01338-AJT-JFA

CLASS ACTION

**LEAD PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that based on the Stipulation and Agreement of Settlement dated January 15, 2021 (the “Stipulation”) and its exhibits, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiff The Regents of the University of California (“Lead Plaintiff”) hereby moves this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of giving notice of the proposed Settlement to the Class; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation, and Lead Counsel’s motion for attorneys’ fees and expenses.<sup>1</sup> The Parties’ agreed-upon [Proposed] Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement is attached hereto as Exhibit 2. In accordance with the terms of the Stipulation, Defendants do not oppose the Motion and Lead Plaintiff believes that the Motion is appropriate for resolution without a hearing.

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<sup>1</sup> All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

Dated: January 15, 2021

Respectfully submitted

/s/ Susan R. Podolsky

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University of California, and Class Counsel for  
the Class*

#1434030

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of January 2021, I electronically filed the foregoing (and its exhibits) with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Susan R. Podolsky  
Susan R. Podolsky (Va. Bar No. 27891)